Mesaba Energy Project, PUC Docket No. E6472/GS-06-668

DOE Draft EIS for the Mesaba Energy Project (DOE/EIS-0382D)
Comments on Draft EIS

Submitted by: Citizens Against the Mesaba Project

4.16 Materials and waste management

4.16.2.1 Impacts of construction

May only accumulate waste on site for 90 days. (with exceptions) What are these exceptions?

Must have at least one employee available to respond to an emergency. What will their qualifications be? What is the detailed emergency response plan?

Materials will be recycled or reused when feasible. How is feasibility determined? Who determines feasibility?

Material will largely be transported by truck. As a regulated greenhouse gas, the amount of carbon dioxide released into the atmosphere as a result of transport needs to be determined. Mobile emissions including on-site equipment, rail transport, truck transport, etc. needs to be quantified. Mobile sources also need to be assessed as to their role in cumulative impact, particularly with regard Minnesota Steel.

4.16.2.2 Impacts of operation

Facility personnel would be trained in the event of a spill or other release. What types of training would these people have? How many employees would have this training? How will local emergency response systems be utilized? What additional training will local emergency response personnel need? How many more will be needed? What is the cost of training and ongoing maintenance of a higher level of training and staffing?

(Non-hazardous waste)

292,000 tons of coal slag would be produced annually. If markets do not exist for this product, is land filling responsible? What is the environmental and economic impact of land filling/disposal?

Local markets would be found for the elemental sulfur produced. What qualifies as a "local" market? What local markets are available? What are the health and safety risks of transporting and/or storing elemental sulfur?

Other non-hazardous materials would be recycled and reused when feasible. Who determines feasibility?

How are these materials to be transported? The amount of pollution generated in transporting these materials need to be calculated.

(Hazardous waste)

If the nearest licensed disposal facility is determined to be Eastern Wisconsin, (there also is no agreement of disposal) have potential environmental consequences been examined? How will this material be transported? Again, what are the health and safety risks of storage, transport, and disposal?

4.16.3.1 Impacts of construction

Have impacts of local species of wildlife been addressed as a result of the clearing of land? Travel corridors, wetlands, fragmentation? These need to be addressed. The East Range site would have no clearing.

4.17 Safety and Health

4.17.2.2 Transportation risks

Are the four trains per day considered round trip or will this number essentially be doubled when you consider the return trip? Also, at four trains per day and 1,200 miles per train, this is a huge expenditure of energy. This needs to be calculated as the emitting of carbon dioxide and other gasses would be considered a health risk.

4.17.2.3 Human health risks

The amount of mercury emitted into the water supply is deemed insignificant. Any additional amount of mercury is too much. These also are hypothetical numbers and have no basis in reality. Are these numbers based on tried and true technology or simply what is provided by Excelsior? Why is the mercury deposition impact zone described by Excelsior in the JPA not included? Why is the impact to over 700 local lakes not included? (See map of mercury deposition impact zone in CAMP comments). Note that the mercury deposition impact zone map is based on Excelsior's earlier maximum projected Hg emissions of about 37 annual lbs, not 54 lbs.

4.17.3.1 HVTL

The issues of eminent domain, forest fragmentation, habitat loss, and the number of additional birds killed striking new lines needs to be addressed. Forest fragmentation was recently identified by the Grand Rapids Chamber of Commerce as a major concern in Itasca County as it relates to our natural environment as well as to our local economy. (See attached MFRC Landscape Guidelines)

4.17.3.2 Natural gas pipelines

Issues of forest fragmentation and imminent domain need to be addressed. See above. The forest fragmentation issues, edge predator influx, etc, is poorly addressed in the DEIS.

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